

J. B. COOPER,

Plaintiff,

vs.

GEORGE ENGLISH,

Defendant.

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IIN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
NUMBER 3025MOTION TO SET ASIDE JUDGMENT NIL DICIT

Comes now the Defendant in the above styled cause, by his attorneys, and moves this Honorable Court to set aside and hold for naught the judgment Nil Dicit heretofore rendered against him by this Court on January 4, 1957 and as grounds for said motion says as follows:

That he did not receive notice of the setting of this case until January 3, 1957 and he was unable to be away from his work on the day that said case was set. That he has a meritorious defense to the claim of the Plaintiff based upon the failure of the Plaintiff to perform the work which he contracted to do for the Defendant in the manner presceibed and for the failure of the Plaintiff to do said work in a good and workmanlike manner.

Respectfully Submitted,

CHASON & STONE

By: 

J. B. COOPER,

Plaintiff,

vs.

GEORGE ENGLISH,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

No. 3025

MOTION TO SET ASIDE
JUDGMENT NIL DICT

FILED

JAN 9 1957

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

J. B. COOPER,
Plaintiff,
vs.
GEORGE ENGLISH,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 3025

DEMURRER

Comes now the Defendant in the above styled cause by his attorneys, and demurs to the Complaint heretofore filed against him and assigns the following separate and several grounds in support thereof:

1. The Complaint fails to state a cause of action.
2. The Complaint fails to allege that the work and labor done was at the request of the Defendant.
3. For aught that appears from the Complaint the alleged work and labor was not done at the request of the Defendant.

CHASON & STONE

By: 

Attorneys for Defendant

J. B. COOPER,

Plaintiff,

vs.

GEORGE ENGLISH,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3025

DEMURRER

FILED

OCT 6 1956

ALICE A. BUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon GEORGE ENGLISH to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of J. B. COOPER.

WITNESS my hand this 6th day of September, 1956.

Alice J. Dusk
CLERK

J. B. COOPER
PLAINTIFF
VS
GEORGE ENGLISH
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

1.

The Plaintiff claims of the Defendant the sum of FIFTY FIVE and 50/100 (\$55.50) DOLLARS due from him for work and labor done for the Defendant by the Plaintiff on to-wit, the 15th day of September, 1955, ^{at his request} which sum of money with interest thereon, is still unpaid.

Wilters & Brantley

By: Robert M. Brantley
Attorneys for the Plaintiff